

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

IN RE:           WAREHOUSE 86, LLC  
                  DEBTOR

CASE NO. 08-03423 EE  
CHAPTER 7

**TRUSTEE'S APPLICATION FOR EMPLOYMENT OF COUNSEL**

Kimberly R. Lentz, Chapter 7 Trustee, files this her Application for the Employment of Counsel, and in support of same would show unto the Court that this cause appears to be an asset case wherein the Trustee will require the advice and assistance of counsel.

1.

That the Trustee has selected William J. Little, Jr., Attorney with the Law Firm of Lentz & Little, PA, for the reason that he has considerable experience in matters of this character and is somewhat qualified to represent the Trustee.

WHEREFORE, PREMISES CONSIDERED, the Trustee, Kimberly R. Lentz, would pray that the Court appoint William J. Little, Jr., Attorney with the Law Firm of Lentz & Little, PA, duly licensed and qualified to practice before this Honorable Court, to act as attorney for the Trustee. Your Trustee would further pray for such other and further relief as is just and proper in the premises.

Respectfully Submitted,  
KIMBERLY R. LENTZ, TRUSTEE

By: /s/ William J. Little, Jr.  
WILLIAM J. LITTLE, JR. (BAR NO. 1287)

OF COUNSEL:

Lentz & Little, PA  
Post Office Box 927  
Gulfport, Mississippi 39502  
Telephone (228) 867-6050  
Facsimile (228) 867-6077

**CERTIFICATE OF SERVICE**

I, WILLIAM J. LITTLE, Jr., do hereby certify that the following have been served electronically via ECF with a copy of the foregoing document:

United States Trustee : USTPRegion05.JA.ECF@usdoj.gov  
Christopher R. Maddux, Attorney for Debtor: chris.maddux@butlersnow.com  
John A. Crawford, Jr., Attorney for Debtor: jack.crawford@butlersnow.com  
Stephen W. Rosenblatt, Attorney for Debtor: Steve.Rosenblatt@butlersnow.com

I further certify that I mailed a true and correct copy of the foregoing document to:

Warehouse 86, LLC.  
Post Office Box 16692  
Jackson, MS 39236

This the 23<sup>rd</sup> day of February, 2011.

/s/ William J. Little, Jr.  
WILLIAM J. LITTLE, JR.

IN THE UNITED STATES BANKRUPTCY COURT  
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IN RE: WAREHOUSE 86, LLC  
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DECLARATION OF PROPOSED COUNSEL FOR TRUSTEE

1. My name is WILLIAM J. LITTLE, JR.. I am over 21 years of age and am competent to make this Declaration pursuant to the requirements of Rule 2014 of the Federal Rules of Bankruptcy Procedure.

2. I have personal knowledge of all facts stated in this Declaration.

3. I am a member of the firm of Lentz & Little, PA, a professional association ("Lentz"), and am located in the firm's offices at 2012 23<sup>rd</sup> Avenue, Gulfport, Mississippi.

4. This Declaration is filed in connection with the Trustee's Application for Employment of Counsel, filed with the Court by the Trustee.

5. I am a member in good standing of the State Bar of Mississippi and duly admitted to practice in the United States District Courts for the Northern and Southern Districts of Mississippi.

6. Except as set forth herein, that neither the firm nor I, to the best of my knowledge, have any connection or affiliation with the Debtor's, creditors, and any party in interest appearing in this case. Based upon investigation and to the best of my present knowledge and belief, the firm does not have any connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee except that Kimberly R. Lentz, an employee, officer, shareholder and director of Lentz & Little, PA is a Chapter 7 panel trustee serving in this Judicial District and is serving as Chapter 7 Trustee in this case.

7. I declare under penalty of perjury that the above and foregoing statements are true and correct, to the best of my knowledge, information and belief.

DATED: This the 16<sup>th</sup> day of February, 2011.

By: 

WILLIAM J. LITTLE, JR.

PROPOSED COUNSEL FOR THE TRUSTEE

STATE OF MISSISSIPPI  
COUNTY OF HARRISON

Personally appeared before me, the undersigned authority in and for the said county and state, on this 16<sup>th</sup> day of February, 2011, within my jurisdiction, the within named William J. Little, Jr., who acknowledged that she executed the above and foregoing instrument.

  
NOTARY PUBLIC

